

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:16-cv-03088-
)	ELR
STATE OF GEORGIA,)	
)	
Defendant.)	
)	

**INDEX OF EXHIBITS TENDERED IN SUPPORT OF UNITED STATES'
MOTION FOR PARTIAL SUMMARY JUDGMENT**

COMES NOW, the United States of America, plaintiff in the above-captioned civil action, by and through its undersigned counsel of record, and hereby tenders the following exhibits in support of its Motion for Partial Summary Judgment filed concurrently herewith:

INDEX OF LETTERED EXHIBITS

Exh. No.	Description
A.	Deposition Transcript (Excerpts) of Vickie Cleveland, dated 8/17/2022
B.	Deposition Transcript (Excerpts) of Haley Livingston, dated 1/30/2023
C.	Deposition Transcript (Excerpts) of Lakesha Stevenson, dated 9/22/2022

D.	Deposition Transcript (Excerpts) of Wendy Tiegreen, dated 6/21/2022
E.	Deposition Transcript (Excerpts) of Frank Berry, dated 7/29/2022
F.	Deposition Transcript (Excerpts) of Judith Fitzgerald, dated 8/16/2022
G.	Deposition Transcript (Excerpts) of Lisa Futch, dated 10/25/2022
H.	Deposition Transcript (Excerpts) of Dante McKay, dated 1/27/2022
I.	Deposition Transcript (Excerpts) of Brooke Cole, dated 10/27/2022
J.	Deposition Transcript (Excerpts) of Amber McCollum, dated 11/9/2022
K.	Deposition Transcript (Excerpts) of Clara Keith Brown, dated 6/7/2022
L.	Deposition Transcript (Excerpts) of Wina Low, dated 2/28/2023
M.	Deposition Transcript (Excerpts) of Sonia Shaun Owen, dated 12/12/2022
N.	Deposition Transcript (Excerpts) of Deborah Gay, dated 7/27/2022
O.	Deposition Transcript (Excerpts) of William Matthew Jones, dated 1/10/2023
P.	Deposition Transcript (Excerpts) of James Theodore Beck, dated 1/27/2023
Q.	Deposition Transcript (Excerpts) of Patricia Wolf, dated 10/6/2022
R.	Deposition Transcript (Excerpts) of Whitney Braddock, dated

	7/18/2022
S.	Deposition Transcript (Excerpts) of Derrick Gilchrist, dated 9/29/2022
T.	Deposition Transcript (Excerpts) of Cassandra Holifield, dated 12/1/2022
U.	Deposition Transcript (Excerpts) of Celest Ngeve, dated 7/15/2022
V.	Deposition Transcript (Excerpts) of Samuel Clemons, Sr. dated 12/15/2022
W.	Deposition Transcript (Excerpts) of Jacqueline Neal, dated 1/19/2023
X.	Deposition Transcript (Excerpts) of Talithia Newsome, dated 7/12/2022
Y.	Deposition Transcript (Excerpts) of Michael Rowland, dated 6/9/2022
Z.	Deposition Transcript (Excerpts) of Geronald Bell, dated 1/9/2023
AA.	30(b)(6) Deposition Transcript (Excerpts) of Rusk Roam, Jr., dated 3/6/2023
BB.	Deposition Transcript (Excerpts) of David Ackerman, dated 8/31/2022
CC.	Deposition Transcript (Excerpts) of Larry Winter, dated 11/30/2022

INDEX OF NUMBERED EXHIBITS

Exh. No.	Depo Ex#/ Bates #	Description
1.	N/A	Defendant's Objections and Responses to Plaintiff's First Requests for Admission
2.	N/A	FY 24 GNETS Directory (Updated July 2023)
3.	N/A	FY 23 GNETS Directory (Updated June 2022)
4.	N/A	Ask DOE - Schools and Districts
5.	GA05242789	SY21 GNETS Enrollment Data
6.	GA05242790	SY22 GNETS Enrollment Data
7.	Ex 82	GNETS State Board of Education Rule (Adopted June 15, 2017)
8.	Ex 165/ GA00396806	Georgia Department of Community Health's Policies and Procedures for Early and Periodic Screening, Diagnostic and Treatment Services (Revised October 1, 2020)
9.	N/A	Georgia Department of Community Health's Peach Care for Kids website
10.	N/A	APEX 3.0 Frequently Asked Questions
11.	GA01286674	Email re: GNETS Rule Feedback Sessions
12.	Ex 697/ GA01852181	Georgia Department of Education Organizational Chart 10-09-2020
13.	Ex 904/ GA00278665	Email from Ted Beck to Dave Lakly re: GNETS Program Manager
14.	Ex 420/ GA00119322	GNETS Education Program Specialist Job Announcement and Related Email
15.	Ex 421/ GA00953298	GNETS Program Specialist Responsibilities-10-29-19 and Related Email
16.	GA00061974	GNETS Project Management Activities and Milestones
17.	GA00198520	GaDOE-GNETS Project Management Plan

18.	Ex 388/ GA00362004	GNETS Strategic Plan (Updated 1/28/2020)
19.	Ex 309/ GA00221993	GNETS Strategic Plan (6/20/2016)
20.	Ex 291/ GA00404365	GNETS Strategic Plan Year 4 and Related Email
21.	Ex 290/ GA00776953	GNETS Strategic Plan Working Draft 2/5/2016 and Related Email
22.	Ex 80/ GA00053667	Guidance for Completing GNETS Strategic Plan and Related Email
23.	Ex 234/ Rutland 000610	Letter from Vickie Cleveland to Celest Ngeve (12/7/2020)
24.	Ex 272/ GA00901798	FY19 Results for GNETS End of Year Strategic Plan Compliance Review (9-13-19) and Related Email
25.	Ex 733/ GA00324971	Tips for 2018 Strategic Plan Reviews and Related Email
26.	Ex 389/ GA00337236	GNETS Reporting Presentation (11-14-18), On-Site Monitoring Schedule, and Related Email
27.	Ex 428/ GA00963511	Email from L. Stevenson re: Coastal Academy FY20 Strategic Plan Results
28.	Ex 427/ GA00960449	Email from L. Stevenson re: Pathways Educational Program GNETS Strategic Plan
29.	Ex 580/ Elam 3.18.22 Supplement 3492	Letter from Vickie Cleveland to Brooke Cole (7/1/2019)
30.	Ex 199	Guiding Questions for Consideration of GNETS Services
31.	Ex 221/ Rutland 000297	Request for GNETS Consultation (Revised August 2018)
32.	Ex 222/ Rutland 000291	GNETS Confidential Student Information Packet (Revised June 2018)
33.	Ex 223/ Rutland 000299	GNETS Services Flow Chart (Revised August 2018)
34.	Ex 241/ Rutland	Rutland Academy Updates Board of Control

	000002	
35.	Ex 460/ GA00030538	8/21/2018 GNETS Meeting Agenda, Consideration of Services Forms, and Related Email
36.	Ex 482	GNETS Confidential Student Information Packet (Revised 10/2020)
37.	Ex 483	Guiding Questions for Consideration of GNETS Services (Revised June 2018)
38.	Ex 484	GNETS Services Flow Chart (Revised October 2020)
39.	Ex 485	Request For GNETS Consultation (Revised October 2020)
40.	Ex 488/ GA00794197	10/4/2017 Email from P. Wolf re: Consideration for GNETS Services - Draft of Forms
41.	Ex 489/ GA00132036	10/24/2017 Email from P. Wolf to V. Cleveland re: Consideration for GNETS Services Meeting today at 1pm
42.	Ex 491/ GA00013170	11/16/2017 Email from P. Wolf to N. Rahming and V. Cleveland re: PowerPoint for LEA Collaborative December 7th on Consideration of Services
43.	Ex 495/ GA00328367	7/16/2018 Email from P. Wolf to V. Cleveland and GNETS directors re: Consideration of Services Forms
44.	Ex 411/ CGCA000001	Summary of Procedures for Processing Referrals to Coastal Georgia Comprehensive Academy GNETS
45.	Ex 559	Guiding Questions For Considerations For GNETS Services (Revised June 2018)
46.	Ex 725	GNETS Confidential Student Information Packet
47.	Ex 851	Request For GNETS Consultation (Revised August 2018)
48.	Ex 486/ GA00793042	9/6/2017 Email from P. Wolf re: Consideration of Services
49.	Ex 487/ GA00794159	10/4/2017 Email from P. Wolf re: Consideration of Services
50.	Ex 490/ GA01941385	11/7/2017 Email from P. Wolf to N. Rahming

51.	Ex 492/ GA00014016	12/11/2017 Email from N. Rahming to P. Wolf et al. re: Consideration of Services - Revised
52.	Ex 493/ GA00327280	6/20/2018 Email from P. Wolf to V. Cleveland re: Finalized Consideration of Services Forms
53.	Ex 494/ GA00327446	6/21/2018 Email from P. Wolf to V. Cleveland re: Consideration
54.	Ex 503/ GA00403823	GNETS Strategic Plan Year 4 -Recommendations from Wolf and Related Email
55.	Ex 652/ GA00041160	3/30/2016 Email from C. Holifield to N. Rahming re: March 2016 GaDOE GNETS Directors Meeting in Milledgeville
56.	Ex 218/ GA00338047	12/14/2018 Email thread from C. Ngeve to V. Cleveland re: Enrollment info
57.	Ex 387/ GA00363542	GaDOE Student Information Checklist FY21 and Related Email
58.	Ex 630/ GA00041656	FY 16 GNETS Annual Verification Report Data Management Tool and Related Email
59.	Ex 850/ GA00334246	9/28/2018 Email from J. Neal to V. Cleveland re: Monthly Log for Therapeutic Services
60.	Ex 862/ GA00327496	6/25/2018 Email from J. Neal to V. Cleveland re: Restraint Data
61.	Ex 768/ GA00337967	12/14/2018 Email from H. Livingston to V. Cleveland re: GNETS Enrollment info
62.	Ex 775/ GA00347397	6/4/2019 Email from H. Livingston to V. Cleveland re: Coordinator and SW survey
63.	Ex 779/ GA00347076	5/30/2019 Email from H. Livingston to V. Cleveland re: RBT status
64.	Ex 386/ GA00364535	12/2/2020 Email from Vickie Cleveland to GNETS Program Directors re: File review
65.	Ex 578/ GA00363717	11/5/2020 Email from B. Cole to V. Cleveland re: Regional TA Meeting/Link
66.	Ex 228/GA00055066	12/2/2020 Email from C. Ngeve re: File review

67.	Ex 497/ GA00042505	11/18/2016 Email from P. Wolf to N. Rahming re: 4 year old
68.	Ex 498/ GA00781443	8/2/2016 Email from N. Rahming to P. Wolf and B. Cole re: Jasper County
69.	Ex 542/ GA01064131	3/21/2019 Email from L. Futch to V. Cleveland et al. re: Wayne County School System GNETS Relocation FY 20
70.	Ex 567/ GA00338963	1/15/2019 Email chain from B. Cole to V. Cleveland and L. Stevenson re: ID Enrollment info
71.	Ex 727/ GA00226017	9/19/2016 Email thread from N. Rahming to S. Clemons re: Referral
72.	Ex 728/ GA00784317	3/8/2017 Email from S. Clemons to N. Rahming re: Question
73.	Ex 70/ GA00152939	3/6/2018 Email from C. Holifield to C. Keith re: GNETS Questions
74.	Ex 224/ GA00354672	10/25/2019 Email from C. Ngeve to V. Cleveland re: J. Brown
75.	Ex 226/ GA00356905	1/3/2020 Email from C. Ngeve to V. Cleveland re: Chat?
76.	Ex 250/ GA00317244	3/12/2018 Email from W. Braddock to V. Cleveland re: System moves
77.	Ex 254/ GA00013594	12/6/2017 Email from W. Braddock to V. Cleveland re: Iready Student Transfer
78.	Ex 429/ GA00956689	Copy of GNETS Director Meeting Questions (2020-05-26) and Related Email
79.	Ex 448/ GA00356682	12/12/2019 Email from D. Gilchrist to V. Cleveland et al. re: Funding summary
80.	Ex 458/ GA00785867	4/11/2017 Email from D. Gilchrist to N. Rahming re: PT Psychologist
81.	Ex 552/ GA00082998	3/15/2018 Email from Lisa Futch to V. Cleveland et al. re: Aroma Therapy for emotional support
82.	Ex 553/ GA00357358	1/20/2020 Email from L. Futch to V. Cleveland re: Project Based Learning

83.	Ex 566/ GA00322208	5/16/2018 Email chain from B. Cole to V. Cleveland re: GAA guidance
84.	Ex 777/ GA00790800	7/21/2017 Email from H. Livingston to Nakeba Rahming re: GNETS Calendar and SDQ data
85.	Ex 778/ GA00347755	6/12/2019 Email from H. Livingston to V. Cleveland re: LCSW Grant
86.	Ex 863/ GA00063584	8/22/2016 Email from J. Neal to N. Rahming re: Budget Amendment
87.	Ex 456	South Metro GNETS Therapeutic Service and Intervention Tiers (2021-2022)
88.	Ex 496/ GA00130964	GNETS Director's Meeting Final Agenda 1-24 to 25-2017 and Related Email
89.	Ex 634/ GA00321183	5/9/2018 Email from C. Holifield to V. Cleveland re: Format for interventions
90.	Ex 647/ GA00063361	8/9/2016 Email from C. Holifield to N. Rahming re: GNETS
91.	Ex 390/ GA00054562	Assurances FY20 GNETS and Related Email
92.	Ex 913/ GA00066194	Signed Contract 18379 Curriculum Associates and Related Email
93.	Ex 914/ GA00066184	Signed Contract 18363 Pearson and Related Email
94.	Ex 227/ GA00362585	10/6/2020 Email from C. Ngeve to V. Cleveland re: SDQ/BASC Follow-up
95.	Ex 499/ GA00326222	GNETS 2017 - 2018 Screening, Diagnostic, and PL Calendar and Related Email
96.	Ex 631	North Metro GNETS FY22 Grant Application
97.	Ex 729/ GA00361784	8/24/2020 Email from V. Cleveland to S. Clemons re: GNETS Calendar
98.	Ex 115/ GA00196767	1/7/2016 Email from M. Rowland to D. Suits re: GNETS visit: Cobb County (HAVEN Academy)
99.	Ex 118/ GA00279624	5/31/2016 Email from M. Rowland to T. Beck and N. Rahming re: GNETS Update
100.	Ex 91/	July 22, 2016 Letter from Michael P. Royal to Dr.

	GA01486054	James Pope and Related Email
101.	Ex 129/ GA00196913	GSFIC Request for Qualifications Project No. E-414-FY16-GNET
102.	Ex 90/ GA00197241	GNETS Exit Strategy-Plan - for Priority Sites and Related Email
103.	Ex 119/ GA00197246	GNETS Priority Facilities List 071416 and Related Email
104.	Ex 829/ GA03468710	GNETS Facilities Online Meeting Presentation, Scripts, and Related Email
105.	Ex 88/ GA00198597	GNETS Facilities Letter of Assurance and Related Email
106.	N/A	Governor's Office of Planning & Budget, Budget Process
107.	Ex 570/ Elam 3.18.22 Supplement 3467	Elam Alexander Grant Application FY 2022
108.	Ex 229/ Rutland 002910	Rutland Academy Grant Application FY2021
109.	Ex 722	Horizon Grant Application FY2022
110.	Ex 861	Northstar Educational and Therapeutic Services Grant Application FY2021
111.	Ex 588/ GA03803300	3/11/2016 Email from A. McCollum to S. Benson re: Draft FY17 GNETS Allocations
112.	Ex 593/ GA03803423	3/21/2016 Email from A. McCollum to M. Seay re: Draft FY17 GNETS Allocations
113.	Ex 657/ GA02326483	7/6/2020 Email from C. Holifield to Z. SmithDixon re: FY21 Preliminary GNETS State and Federal Grant Allocations
114.	Ex 73/ GA00792054	8/16/2017 Email from C. Keith to N. Rahming re: SBOE templates
115.	Ex 616	GaDOE Item for State Board of Education Approval - FY20 GNETS Grant for Supplemental Instruction
116.	Ex 617	GaDOE Item for State Board of Education Approval - FY20 State Allocation Therapeutic Services

		Reimbursement for GNETS Fiscal Agents
117.	Ex 71/ GA00197223	6/24/2016 Email from N. Rahming to C. Keith re: Therapeutic Supports
118.	Ex 74/ GA00198949	8/22/2017 Email from N. Rahming to C. Keith re: Please provide feedback
119.	Ex 380/ GA00346118	GNETS One Pager for SBOE Therapeutic Supports and Related Email
120.	Ex 384/ GA00014291	12/14/2017 Email from J. Neal to V. Cleveland and N. Rahming re: Assurance - RESA-NS-StaffRehab
121.	Ex 555/ GA00097408	2/26/2020 Email from L. Futch to V. Cleveland re: Therapeutic Services Grant
122.	Ex 702/ GA05057496	GNETS Weekly Meeting Agenda 8-19-20 and Related Email
123.	Ex 847/ GA00014174	12/12/2017 Email from J. Neal to V. Cleveland re: DOE Therapeutic Position
124.	Ex 906/ GA00284672	9/28/2017 Email from T. Beck to L. Winter re: Item Requested by Mr. Winter in Budget Committee Meeting
125.	Ex 750/ GA00007217	All DOE Updates 4.5.19 and Related Email
126.	Ex 72/ GA00198908	FY18 Therapeutic Staff Assurances and Related Email
127.	Ex 478/ GA00326123	6/13/2018 Email chain from V. Cleveland to P. Wolf re: social workers
128.	Ex 479/ GA00329465	7/24/2018 7 Email chain from V. Cleveland to P. Wolf re: Therapeutic Services Reimbursement for Social Workers
129.	Ex 245/ GA00334101	9/26/2018 Email from C. Ngeve to V. Cleveland et al. re: Monthly Log for Therapeutic Services
130.	Ex 246/ GA00343329	3/29/2019 Email from C. Ngeve to V. Cleveland re: LCSW log
131.	Ex 431/ GA00951657	Copy of 2019-20 Therapeutic Services Log and Related Email from L. Stevenson
132.	Ex 256/	Cedarwood Interventions and Providers FY18 and

	GA00320375	Related Email
133.	Ex 469/ GA00952013	FY20 GNETS of Oconee Funding Ratios as of 9-4-19 and Related Email
134.	Ex 470	GNET of Oconee FY2022 Grant Application
135.	GA00321621	5/11/2018 Email from C. Holifield to V. Cleveland re: FY 18 Assurance

Dated: October 21, 2023

Respectfully submitted:

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L.R. 7.1(D) CERTIFICATION

I certify that this Index has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this brief has been prepared using 14-pt Times New Roman Font.

/s/ Andrea Hamilton Watson
ANDREA HAMILTON WATSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sent counsel of record e-mail notification of such filing.

This 21st day of October, 2023.

/s/ Andrea Hamilton Watson
ANDREA HAMILTON WATSON